| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9 | SONYA Z. MEHTA, SBN 294411 SIEGEL, YEE, BRUNNER & MEHTA 475 14th Street, Suite 500 Oakland, California 94612 Tel: 510-839-1200 Fax: 510-444-6698 sonyamehta@siegelyee.com  DAT HOANG PHAN, SBN 316813 HENNIG, KRAMER, RUIZ AND SINGH, LI 3600 Wilshire Boulevard Suite 1908 Los Angeles, CA 90010 Tel: 213-310-8301 Fax: 213-310-8302 dat@employmentattorneyla.com | RETU R. SINGLA, SBN 4162822 Tel: 646-228-4719 rsingla@workingpeopleslaw.com SETH L. GOLDSTEIN, SBN 2160182 Tel: 646-460-1309 Fax: 251-319-2955 sgoldstein@workingpeopleslaw.com JULIEN MIRER SINGLA AND GOLDSTEIN PLLC LP One Whitehall Street, 16th Floor New York, NY 10004 ADMITTED PRO HAC VICE  Attorneys for Defendant TRADER JOE'S UNITED |
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| 11  |  |  |
| 12  |  | DISTRICT COURT   |
| 13  | CENTRAL DISTRIC  | CT OF CALIFORNIA   |
| 14  | TRADER JOE'S COMPANY, a California )   | Case No. 2:23-cv-05664-HDV-MAR   |
| 15  | corporation,   |  |
| 16  | )  | DEFENDANT TRADER JOE'S<br>UNITED'S APPLICATION TO  |
| 17  | ) Plaintiff,   | APPEAR REMOTELY  |
| 18  | Plaintin,  | Filed Concurrently with Declaration of   |
| 19  | }  | Sonya Mehta and [Proposed] Order   |
| 20  | vs.  | Hon. Hernán D. Vera  |
| 21  |  | Date: April 11, 2024<br>Ctrm: 5B   |
| 22  | TRADER JOE'S UNITED,   | Time: 10:00 a.m.   |
| 23  | Defendant.   | Complaint Filed: July 13, 2023   |
| 24  | )  |  |
| 25<br>25                                  |  |  |
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*Trader Joe's Company v. Trader Joe's United*, Case No. 2:23-cv-05664-HDV-MAR Defendant Trader Joe's United's Application for Mehta to Appear Remotely – 1

APPLICATION TO APPEAR REMOTELY

Defendant Trader Joe's United (TJU) respectfully requests that this Court allow its counsel Sonya Mehta to appear remotely for the hearing on Defendant's Motion for Attorneys' Fees scheduled for April 11, 2024, at 10 a.m. in Los Angeles.

There is good cause for a remote appearance. Defendant's attorney Sonya Mehta wrote the instant motion and will argue it. (Declaration of Sonya Mehta,  $\P$  1.) Attorney Mehta lives in Oakland, California, and will need to fly or drive to Los Angeles, either of which will consume at least one to two days' time as well as travel costs. (Id.,  $\P$  2.) It would be a great help to Mehta to save the travel time needed here as she has motion work due in another civil rights case, next week. (Id.,  $\P$  3.)

In addition, Trader Joe's United, a fledgling union with extremely modest funds, would appreciate the cost savings. (Id.,  $\P$  4.)

TJU thanks this Court for its consideration.

Dated: April 5, 2024 SIEGEL, YEE, BRUNNER & MEHTA

By: <u>/s/ Sonya Z. Mehta</u> Sonya Z. Mehta

Attorneys for Defendant TRADER JOE'S UNITED

Trader Joe's Company v. Trader Joe's United, Case No. 2:23-cv-05664-HDV-MAR Defendant Trader Joe's United's Application for Mehta to Appear Remotely – 2